

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

WILLARD DAMRON,

Plaintiff,

v

MAHENDRASINGH RATHOD and
SINGH FREIGHT SERVICES, INC.

Defendants.

CASE NO.

HON.

MARC J. MENDELSON (P52798)
ERIC M. SIMPSON (P57232)
SHAWN P. McKAY (P77856)
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NOTICE OF FILING REMOVAL NOTICE

To: THE JUDGES OF THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

1. January 21, 2022, an action was filed against defendants Mahendrasingh Rathod and Singh Freight Services, Inc., in the Circuit Court for the County of Wayne, State of Michigan entitled Willard Damron v Mahendrasingh Rathod and Singh Freight Services, Inc., Case No. 2022-000817-NI.

2. The above described action is a civil action of which this court

has original jurisdiction under the provisions of 28 U.S.C. § 1332 and is one which may be removed to this court by petitioner defendants herein, pursuant to the provisions of 28 U.S.C. § 1441, in that it is a civil action wherein the matter in controversy is in excess of the sum or value of \$75,000, exclusive of interest and costs and is between citizens of different states. The plaintiff at the time this action was commenced, upon information and belief, was and still is a citizen of Michigan. However, both defendants, at the time this action was commenced, were citizens or corporations from Pennsylvania and Virginia. None of the defendants are citizens of Michigan or corporations with a principal place of business in Michigan.

3. Defendants Mahendrasingh Rathod and Singh Freight Services, Inc. desire to remove this action to this Court as provided in 28 U.S.C. § 1446 and does so within 30 days of service based complete diversity of citizenship and proper jurisdiction with the Federal Court.

WHEREFORE, Defendants Mahendrasingh Rathod and Singh Freight Services, Inc. notifies all parties that the above action now pending in the Circuit Court for the County of Wayne in the State of Michigan is removed to the United States District Court for the Eastern District of Michigan.

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on April 20, 2022, by:

- ☐ U.S. Mail ☐ Fax
☐ Hand Delivered ☐ Overnight Courier
☐ Federal Express ☒ **E-Filed**

Signature: /s/ Barbara B. Osentoski
Barbara B. Osentoski

Respectfully submitted,

WARD, ANDERSON, PORRITT,
BRYANT, LORD & ZACHARY

By: /s/ **RUSSELL W. PORRITT II**
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DATED: April 20, 2022